

United States Government

Department of Energy  
Bonneville Power Administration

# memorandum

DATE: December 3, 2001

REPLY TO  
ATTN OF: KEP/Z992

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS  
(DOE/EIS-0285/SA-34)

TO: Bill Erickson - TFP/Walla Walla  
Jim Jellison - TFO/Olympia

**Proposed Action:** Vegetation Management along the McNary-Ross Transmission Line ROW between 152/3+2120 to 153/4. The line is 345 kV Single Circuit Transmission Line (project includes adjacent N. Bonneville-Ross 230 kV Single Circuit Transmission Line) having a combined easement width of 300 feet. The proposed work will be accomplished in the indicated sections of the transmission line corridor.

**Location:** The ROW is located in Skamania County, WA, being in the Olympia Region.

**Proposed by:** Bonneville Power Administration (BPA).

**Description of the Proposed Action:** BPA proposes to clear unwanted vegetation in the rights-of-ways and around tower structures that may impede the operation and maintenance of the subject transmission line. Also, access road clearing will be conducted. All work will be in accordance with the National Electrical Safety Code and BPA standards. BPA plans to conduct vegetation control with the goal of removing tall growing vegetation that is currently or will soon be a hazard to the transmission line. BPA's overall goal is to have low-growing plant communities along the rights-of-way to control the development of potentially threatening vegetation.

**Analysis:** This project meets the standards and guidelines for the Transmission System Vegetation Management Program Final Environmental Impact Statement (FEIS) and Record of Decision (ROD).

## Planning Steps

### *1. Identify facility and the vegetation management need.*

The work involved will be to clear tall growing vegetation that is currently or will soon pose a hazard to the lines; treat the associated stumps and re-sprouts with herbicides to ensure that the roots are killed preventing new sprouts and selectively eliminating tall growing vegetation *before* it reaches a height or density to begin competing with low-growing vegetation. All work will take place in existing rights-of-ways.

Also, all off right-of-way trees that are potentially unstable and will fall within a minimum distance or into the zone where the conductors swing will be removed at a future date. All work will be accomplished by selective vegetation control methods to assure that there is little potential harm to

non-target vegetation and to low-growing plants. Desirable low-growing plants will not be disturbed. The work will provide system reliability.

Access roads will be treated using mowing and herbicide applications.

The vegetation control is designed to provide a 5-8 year maintenance free interval. The overall vegetation management scheme will initially include selective removal and treatment of tall growing species utilizing cut and stump treat methods using practically non toxic to slightly toxic herbicides as outlined in the attached checklist.

Subsequent work will be needed as follow-up to treat misses and any other re-growth from 2-3 years after initial treatment. Noxious weed treatments may be needed at this time.

Future cycles - As tall growing species are controlled, 5-8 year entry treatments will be needed. Also a review of Danger trees and other hazards will take place at that time.

## *2. Identify surrounding land use and landowners/managers.*

The subject corridor traverses, rural, industrial forestlands and State Department of Forestry lands. Landowners were notified of the upcoming work by letters. In addition homes within 200 feet of the ROW will be contacted prior to treatments. The State Department of Natural Resources was also notified by letter.

## *3. Identify natural resources.*

Some riparian areas and a T&E stream (Washougal River) have been identified in the areas of the proposed work. In addition, the project will cross a steep slope area between 12/3 +2360 and 153/3 and a spanned canyon from 153/3 to 153/4.

No other T&E/wildlife issues, visually sensitive areas, cultural resources or other natural resource issues have been identified along the other work corridor.

The herbicides used for vegetation management will be consistent with what is specified in the Vegetation Management FEIS.

## *4. Determine vegetation control and debris disposal methods.*

A licensed contractor would undertake the proposed work. The unwanted vegetation would be removed by employing cut stump, basal and foliar treatment methods. Chemical means would be employed to prevent resprouts from the cut stumps. Herbicides used would be applied by licensed applicators following manufacturers' label instructions and BPA's management prescriptions. Herbicide used would be consistent with the guidance outlined in the Vegetation Management FEIS.

The contractor will receive a list of required mitigation measures (management prescriptions) to follow as well as a set of maps delineating the transmission line and potential sensitive resource areas. The contractor will follow manufacturers' label instructions when applying herbicides.

Debris will be disposed by:

Lop and Scatter - (Branches of a fallen tree are cut off (lopped) by ax or chainsaw, so the tree trunk lies flat on the ground. The trunks are occasionally cut in 1-to-2-m (4-to-8-ft.) lengths. The cut branches and trunks are then scattered on the ground, laid flat, and left to decompose.)

5. *Determine revegetation methods, if necessary.*

No re-vegetation will be conducted at this time.

6. *Determine monitoring needs.*

An inspector will monitor the work being performed at the time of the initial work. Follow-up inspections will be performed during routine regular patrols. Additional required work would be identified at that time.

7. *Prepare appropriate environmental documentation.*

This Supplement Analysis finds that 1) the proposed actions are substantially consistent with the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285) and ROD, and; 2) there are no new circumstances or information relevant to environmental concerns and bearing on the proposed actions or their impacts. Therefore, no further NEPA documentation is required.

/s/ Elaine Stratton  
Elaine Stratton  
Environmental Protection Specialist

CONCUR: /s/ Thomas C. McKinney  
Thomas C. McKinney  
NEPA Compliance Officer

DATE: 12/10/01

Attachments

# Vegetation Management Checklist

## 1. IDENTIFY FACILITY AND THE VEGETATION MANAGEMENT NEED

### 1.1 Describe Right-of-way.

Corridor Name	Corridor Length & kV	Easement width	Miles of Treatment
McNary Ross 152/3+2120 to 153/4	1 mile 345 kv and 230	300 '	1 mile

See Handbook — [List of Right-of-way Components](#) for checkboxes and the requirements for the components [Rights-of-way](#), [Access Roads](#), [Switch Platforms](#), [Danger Trees](#), and [Microwave Beam paths](#).

Right Of Way:

Right-of-Way – clearing in right-of-way

Transmission Structures – clearing around

Access Road clearing - approximate miles – 600 '

Danger Tree clearing

### 1.2 Describe the vegetation needing management.

See handbook — List of Vegetation Types, Density, Noxious Weeds for checkboxes and requirements.

Vegetation Types:

Douglas Fir

True Fir

Spruce

Alder

Willows

Wild Cherry

High (250 + stems/per acre)

### 1.3 List measures you will take to help promote low-growing plant communities. If promoting low-growing plants is not appropriate for this project, explain why. See Handbook — for requirements and checkboxes.

Tall-growing vegetation that is currently or will soon be a hazard to the line will be removed. (In places where tall growing vegetation must be left in place, it may not be possible to promote low-growing plants.)

- Cut-stump or follow-up herbicide treatments on resprouting-type species will be carried out to ensure that the roots are killed.
- Vegetation that will grow tall will be selectively eliminated *before* it reaches a height or density to begin competing with low-growing species.
- Desirable low-growing plants will not be disturbed. Only selective vegetation control methods that have little potential to harm non-target vegetation will be used.

### 1.4 Describe overall management scheme/schedule.

See Handbook - [Overall Management Scheme/Schedule](#).

Initial entry – **Treatment will include the selective treatment of tall growing species as outlined in the statement of work. Treatments will include various methods as outlined in the treatment zones.**

Subsequent entries – **subsequent entries will be needed as follow-up to treat misses and any re-growth from 2-3 years after initial treatment. Noxious weeds treatments may be needed**

Future cycles – **As tall growing species are controlled 5-8 year entries treatments will be needed. Also review for Danger trees and other hazards will take place**

## **2. IDENTIFY SURROUNDING LAND USE AND LANDOWNERS/MANAGERS**

### **2.1 List the types of landowners and land uses along your corridor.**

See Handbook — [Landowners/Managers/Uses](#) for requirements, and [List of Landowners/Managers/Uses](#) for a checkbox list.

Landowners/Managers/Uses:

Rural

Industrial Forest lands

**State DNR**

**Describe method for notifying right-of-way landowners and requesting information (i.e., doorhanger, letter, phone call, e-mail, and/or meeting). Develop landowner mail list, if appropriate.**

See Handbook — [Methods for Notification and Requesting Information](#) for requirements.

Letters were sent out to landowners. In addition home within 200 feet of the ROW will be contacted prior to treatments

### **2.3 List the specific land owner/landuse measures — determined from the handbook or through your consultations with the entities — that will be applied.**

See handbook — [Requirements and Guidance for Various Landowners/Uses](#) for requirements and guidance, also [Residential/Commercial](#), [Agricultural](#), [Tribal Reservations](#), [FS-managed lands](#), [BLM –managed lands](#), [Other federal lands](#), [State/ Local Lands](#).

**None. Letter sent to DNR**

### **2.4 Review any existing landowner agreements (e.g. tree/brush Permits or Agreements). List in table above any provisions that need to be followed and where they are located.**

See handbook — [Landowner Agreements](#) for requirements.

**NONE**

### **2.5 List any known casual informal use of the right-of-way by non-owner publics. List any constraints or measure's to take due to the informal use.**

See handbook — [Casual Informal Use of Right-of-way](#) for requirements.

**Limited**

### **2.6 List other potentially affected people, agencies, or tribes (that are not landowners/managers) that need to be notified or coordinated with. Describe method of notification and coordination.**

See handbook — [Other Potentially Affected Publics](#) for requirements and suggestions.

**None**

### 3. IDENTIFY NATURAL RESOURCES

See Handbook — [Natural Resources](#)

**3.1 List any water resources (streams, rivers, lakes, wetlands) that may be impacted by vegetation control activities. For each water body describe the control methods and requirements or mitigation measures that will be used.**

Span		Waterbody	T&E?	Method	Herbicide	Buffer	zone
To	From						
152/3+2127	152/3+2360	Washougal River	yes	See chart	See chart	400'	TR T & E
152/3+2360	152/4	Small creeks	no	See chart	See chart	100'	TR SS RIPAIAN
<b>TR Steep Slope Riparian</b>	<p>State Forest or private lands where steep slope and streams within 30.5 m (100 ft.) are present. This limits the use of mechanical treatments.</p> <p>The conductor clearance to ground is also greater than 75 feet.</p> <p>Available: all manual and biological treatments, limited herbicide treatments.</p> <p><b>Herbicides:</b> Only spot treatments such as cut-stump treatments using practically non-toxic or slightly toxic formulations of Glyphosate, imazapyr, Escort, and Triclopyr (Garlon 3A). Mechanical treatments are limited to roads and structure sites where streams or wetlands are present.</p> <p><b>Transition Zones: TR</b></p> <p>Tall growing trees will be controlled in the following manner.</p> <ol style="list-style-type: none"> <li>1. All conifers over 14 feet tall will be controlled. Conifers over 25 feet tall will be cut for clearance.</li> <li>2. Hardwood trees over 30 feet tall will be cut for clearance and treated.</li> <li>3. Hardwood trees less than 30 feet tall will be left untreated.</li> </ol>						
<b>TR Riparian T&amp;E Salmon</b>	<p>State or private lands, within 122 m (400 ft.) of a listed stream. Available: all manual, spot and localized herbicide, and biological treatments, except grazing. No mechanical treatments.</p> <p><b>Herbicides:</b> No herbicides within 100 feet from the waters edge. From 100 to 400 feet away from streams or water, Escort, Clopyralid, Imazapyr, the Rodeo® formulation of Glyphosate and Triclopyr (Garlon 3A) can be used. Highly Toxic and very Highly toxic (to fish) herbicides will not be used in this zone.</p> <p><b>Transition Zones: TR</b></p> <p>Tall growing trees will be controlled in the following manner.</p> <ol style="list-style-type: none"> <li>1. All conifers over 14 feet tall will be controlled. Conifers over 25 feet tall will be cut for clearance.</li> <li>2. Hardwood trees over 30 feet tall will be cut for clearance and treated.</li> <li>3. Hardwood trees less than 30 feet tall will be left untreated.</li> </ol>						

**3.2 If planning to use herbicides, list locations of any known irrigation source, wells, or springs (landowners maybe able to provide this info if requested).**

See Handbook — [Herbicide Use Near Irrigation, Wells or Springs](#) for buffers and herbicide restrictions.

none

**3.3 List below the areas that have Threatened or Endangered Plant or Animal Species and the name of the species, and any special measures that need to be taken due to their presence. Attach any BAs, T&E maps, or letters from US Fish and Wildlife.**

See Handbook — [T&E Plant or Animal Species](#) for requirements and determining presence.

None listed

**3.4 List any other measures to be taken for enhancing wildlife habitat or protecting species.**

See Handbook — [Protecting Other Species](#) for requirements.

LGPC concept will develop and improve Wildlife species

**3.5 List any visually sensitive areas and the measures to be taken at these areas.**

See Handbook — [Visual Sensitive Areas](#) for requirements.

N/A

**3.6 List areas with cultural resources and the measures to be taken in those areas.**

See Handbook – [Cultural Resources](#) for requirements.

None Identified

**3.7 List areas with steep slopes or potential erosion areas and the measure and methods to be applied in those areas.**

See Handbook – [Steep/Unstable Slopes](#) for requirements.

Span		Describe sensitivity	Method/mitigation measures
from	to		
152/3 +2360	153/3	Steep slope	See below
<b>Steep Slope</b>	<p>State Forest or private lands where steep slopes are present. This limits the use of mechanical treatments.</p> <p>Available: all manual and biological treatments, and herbicide treatments.</p> <p><b>Herbicides:</b> Glyphosate, Picloram, Imazapyr, 2,4-d, Triclopyr (Garlon 3A and Garlon 4), Dicamba may be prescribed for cut-stump, stem-injection, and basal-stem treatments, as well as for spot-foliar, and broadcast-foliar treatments. In addition, Escort and clopyralid can be used for spot foliar and broadcast treatments. Mechanical treatments are limited to roads and structure sites.</p>		
<b>Steep Slope Riparian</b>	<p>State Forest or private lands where steep slope and streams within 30.5 m (100 ft.) are present. This limits the use of mechanical treatments.</p> <p>Available: all manual and biological treatments, limited herbicide treatments.</p> <p><b>Herbicides:</b> Only spot herbicide treatments, such as cut-stump treatments using practically non-toxic or slightly toxic formulations of Glyphosate, imazapyr, Escort, and Triclopyr (Garlon 3A). Mechanical treatments are limited to roads and structure sites where streams or wetlands are present.</p>		

**3.8 List areas of spanned canyons and the type of cutting needed.**

See Handbook – [Spanned Canyons](#) for requirements.

Span		Methods, cutting
To	From	
152/3 +	152/4	<p>Transition Zones: TR</p> <p>Tall growing trees will be controlled in the following manner.</p> <ol style="list-style-type: none"> <li>1. All conifers over 14 feet tall will be controlled. Conifers over 25 feet tall will be cut for clearance.</li> <li>2. Hardwood trees over 30 feet tall will be cut for clearance and treated.</li> <li>3. Hardwood trees less than 30 feet tall will be left untreated.</li> </ol>

#### 4. DETERMINE VEGETATION CONTROL METHODS

See Handbook — [Methods](#)

##### 4.1 List Methods that will be used in areas not previously addressed in steps above.

See Handbook — [Manual](#), [Mechanical](#), [Biological](#), [Herbicides](#) for requirements for each of the methods.

LOCATION			(1)	(2)	(3)	TR	Riparian	SS	FLAT	ST R	ZONE
STR. NO.	FROM	TO	WIDTH	LENGTH	ACRES	Riparian	ACRES	ACRES	ACRES		
152/3	2127	2360	300.0	233	1.6	1.6					TR T&E
152/3	2360	3100	300.0	740	5.1	5.1					TR Steep slope Riparian
152/4	0	900	300	900	6.2		6.2			2	Steep Slope Riparian
153/1	0	350	300.0	350	2.4		2.4			2	Steep Slope Riparian
153/1	350	700	300.0	350	2.4			2.4			Steep Slope
153/2	0	474	300.0	474	3.3			3.3		2	Steep Slope
153/3	0	876	300.0	876	6.0				6.0	2	Zone A
<b>TOTAL FOR PAGE 1</b>					<b>27.0</b>	<b>6.7</b>	<b>8.6</b>	<b>5.7</b>	<b>6.0</b>	<b>8</b>	

<b>A</b>	<p>State Forest or private lands with no other environmental constraints. Available: all manual, mechanical, biological, and herbicidal treatments.</p> <p><b>Herbicides:</b> Glyphosate, Picloram, Imazapyr, 2,4-d, Triclopyr (Garlon 3A and Garlon 4), Dicamba may be prescribed for cut-stump, stem-injection, and basal-stem treatments, as well as for spot-foliar, cut stubble, and broadcast-foliar treatments. In addition, Escort and clopyralid can be used for spot foliar and broadcast treatments.</p>
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#### 5. DETERMINE DEBRIS DISPOSAL AND REVEGETATION

##### 5.1 Describe the debris disposal methods to be used and any special considerations.

See Handbook — [Debris disposal](#) for a checkbox list and requirements.

Lop and Scatter (Branches of a fallen tree are cut off (lopped) by ax or chainsaw, so the tree trunk lies flat on the ground. The trunks are occasionally cut in 1-to-2-m (4-to-8-ft.) lengths. The cut branches and trunks are then scattered on the ground, laid flat, and left to decompose.)

##### 5.2 List areas of reseeding or replanting (those areas not already described in steps 1, 2, or 3).

See Handbook — [Reseeding/replanting](#) for requirements.

N/A

##### 5.3 If not using native seed/plants, describe why.

N/A

##### 5.4 Describe timing and any follow-up that will need to take place to ensure germination/success of seeding/planting.

N/A

#### 6. DETERMINE MONITORING NEEDS

See handbook — [Monitoring](#) for requirements.

**6.1 Describe the follow-up/monitoring cycle that will be used to evaluate the effectiveness of the vegetation control methods used.**

Site will be inspected during treatment. In addition routine patrols by BPA ground and aerial patrols

**6.2 Describe any follow-up or monitoring needed to determine if mitigation measures were effective.**

Routine patrols by BPA ground and aerial patrols

## **7. PREPARE APPROPRIATE ENVIRONMENTAL DOCUMENTATION**

See handbook — [Prepare Appropriate Environmental Documentation](#) for requirements.

**7.1 Describe any potential project impacts or project work that are different than those disclosed in the Transmission System Vegetation Management Program EIS. Describe how those differences impact natural resources and if the differences are “substantial”.**

None

**7.2 Is there a need for additional NEPA documentation (i.e. Forest Service requirement, Record of Decision, supplemental EIS)? If so, attach.**

None